

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

REJHANE LAZOJA,

Plaintiff,

Case No. 18-cv-_____

v.

KRISTJEN NIELSEN, in her official capacity
as Secretary of UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; KEVIN K. MCALEENAN, in
his official capacity as Commissioner,
UNITED STATES CUSTOMS AND
BORDER PROTECTION; ADELE
FASANO, in her official capacity as Port
Director, UNITED STATES CUSTOMS
AND BORDER PROTECTION; JANE DOE,
in her official capacity as an officer, UNITED
STATES CUSTOMS AND BORDER
PROTECTION; and JOHN DOES 1-2, in
their official capacities as officers, UNITED
STATES CUSTOMS AND BORDER
PROTECTION.

MOTION DAY: September 17, 2018

ORAL ARGUMENT REQUESTED

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, Plaintiff, Rejhane Lazoja, through her attorneys, the Council on American-Islamic Relations, New Jersey and the Council on American-Islamic Relations, New York, will move the Court at the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey, on September 17, 2018, for the entry of an Order directing the return of certain seized property to Plaintiff, pursuant to Federal Rule of Criminal Procedure 41(g).

PLEASE TAKE FURTHER NOTICE that Plaintiff will rely upon Plaintiff's Brief in Support of Motion For Return of Property Under Federal Rule of Criminal Procedure 41(g), and Declaration of Jay Rehman, Esq., dated August 23, 2018, annexing: Affidavit of Rejhane Lazoja dated August 22, 2018; Notice to U.S. Customs and Border Protection ("CBP"), dated July 9, 2018; and CBP Policy Directive, dated January 4, 2018, in support of its motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

DATED: August 23, 2018
[Newark, New Jersey]

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS NEW JERSEY

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